

**REMARKS**

**I. Formalities**

Applicant thanks the Examiner for indicating that Applicant's Response Under 37 C.F.R. §1.116, which was filed on March 9, 2006, has overcome the previous rejections under 35 U.S.C. §101.

**II. Status of the Application**

By the present amendment, Applicant adds claims 13-20 to more fully cover various implementations of the invention. Applicant also hereby amends claim 5. Claims 1-20 are all the claims pending in the Application. Claims 1-12 have been rejected.

The present amendment addresses each point of objection and rejection raised by the Examiner. Favorable reconsideration is respectfully requested.

**III. Claim Rejections Under 35 U.S.C. §102**

The Examiner has rejected claims 1-12 under 35 U.S.C. § 102(a) as being anticipated by "ReflectorCAD User's Guide," Breault Research Organization, 1999, pp. 1-87 (hereinafter "BRO"). This rejection is respectfully traversed.

For *at least* the reasons already of record, Applicant respectfully submits that *BRO* fails to teach or suggest independent claim 1's recitation of "b) displaying attribute information concerning an attribute indicative of whether **imaginary light** from the light source position **can effectively reach each of a first plurality of areas into which a first reflecting basic surface, selected from among the plurality of reflecting basic surfaces, is divided** on the basis of the

design information; wherein the plurality of reflecting surfaces are discrete surfaces” (**emphasis added**).

First, contrary to the Examiner’s allegation that the output graph in Figure 24 and the output slider in Figure 9 somehow show that the respective segments are “divided” into a “first plurality of areas,” the cited portions only disclose that: (A) an effective output of the reflector segment at a point distant from the reflector (*i.e.*, in the +Z direction as shown in Figure 6 on p. 22); and that (B) the effective output of the reflector segment as a whole (*i.e.*, the entire output of the selected segment is shown at once, as illustrated in Figure 24 on p. 38).

In response to such arguments, the Examiner asserts that the “output view” represents “the combined contribution of individual samples.” However, Applicant submits that even assuming *arguendo* that the Examiner’s assertion in this regard is correct (which Applicant firmly submits that it is not), that such an alleged “output view” nevertheless fails to teach or suggest in any way whether light effectively reaches various portions of the reflector. In other words, while the “output view” shows the end effect of the reflection of the reflector, it does not indicate in any way whether light is reaching various portions of the reflector.

Moreover, Applicant disagrees with the Examiner’s position that the “samples” are in any way related to any particular divisions of the reflector. Rather, Applicant submits that the alleged “samples” are indicative of the sampling of the light output in the “output view.” In fact, there is no specific teaching or suggestion in BRO that segments are subdivided in any manner, at least with respect to an analysis of whether light impinges upon such subdivisions.

Thus, Applicant respectfully submits that independent claim 1 is patentable over the applied reference.

Further, Applicant respectfully submits that *BRO* fails to teach or suggest: (1) independent claim 6’s “first transmitting means for transmitting, to the display device, attribute information concerning an attribute indicative of whether imaginary light from the light source position can effectively reach each of a first plurality of areas into which a first reflecting basic surface, selected from among the reflecting basic surfaces, is divided;” and (2) independent claim 9’s “first display process for displaying attribute information concerning an attribute indicative of whether imaginary light from the light source position can effectively reach each of a first plurality of areas into which a first reflecting basic surface, selected from among the plurality of reflecting basic surfaces, is divided,” for reasons similar to that discussed above with respect to independent claim 1.

Further, Applicant respectfully submits that rejected dependent claims 2-5, 7, 8 and 10-12 are: (1) allowable at least by virtue of their dependency; and (2) separately patentable over the applied references.

Thus, Applicants respectfully request that the Examiner withdraw these rejections.

#### **IV. New Claims**

Applicant submits that new claims 13-20 are allowable *at least* by virtue of their dependency and by virtue of the recitations set forth therein.

**V. Request for Interview**

Applicant respectfully requests a personal interview with the Examiner to discuss the arguments advanced herein and in the previous Amendment Under 37 C.F.R. 1.116, filed on March 9, 2006.

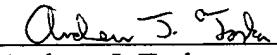
Further, Applicant respectfully requests that the Examiner refrain from issuing any further Office Actions before the requested personal interview is conducted.

**VI. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

  
\_\_\_\_\_  
Andrew J. Taska

Registration No. 54,666

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE  
23373  
CUSTOMER NUMBER

Date: May 10, 2006